

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
v.)	Case No. 18 CR 696
)	Judge John Robert Blakey
ASHRAF AL SAFOO,)	
)	
Defendant.)	

DEFENDANT’S FIRST AMENDMENT JURY INSTRUCTION

Defendant, **ASHRAF AL SAFOO**, by and through his attorneys, **THOMAS ANTHONY DURKIN** and **JOSHUA G. HERMAN**, hereby submits a proposed First Amendment jury instruction to supplement the proposed agreed jury instructions submitted with the parties’ Joint Pretrial Memorandum that was filed on today’s date. (Dkt. #302-2). The attached proposed jury instruction is identical to the instruction recently given by Judge Robert W. Gettleman in *United States v. Osadzinski*, 19 CR 869.

Respectfully submitted,

/s/ Thomas Anthony Durkin

THOMAS ANTHONY DURKIN,

/s/ Joshua G. Herman

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CERTIFICATE OF SERVICE

Joshua G. Herman, Attorney at Law, hereby certifies that the foregoing was served on November 1, 2021, in accordance with Fed.R.Crim.P.49, Fed.R.Civ.P.5, LR 5.5, and the General Order on Electronic Case Filing (ECF) pursuant to the district court's system as to ECF filers.

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